

U.S. BANKRUPTCY COURT  
WESTERN DISTRICT OF VIRGINIA  
Lynchburg Division

IN RE: Virginia Booker Brown

Chapter 13  
Case No. 11-61332

Debtor:

**DEBTOR'S MOTION TO SUSPEND PLAN PAYMENTS**

COMES NOW the above-referenced Debtor, by counsel, and moves the Court to allow her to suspend payments under her Chapter 13 Plan for two months, and in support therefore, states as follows:

1. Debtor filed her case on May 23, 2011. Debtors' plan was confirmed first on December 6, 2011.
2. As of the payment processed by the Trustee on March 19, 2014, the Debtor has paid \$7,442.11 into her case. As of the same date, the balance to pay off Debtors' case is \$7,745.92.
3. Debtor is seeking a two-month plan payment suspension, covering all pay periods processed by her employer between March 25, 2014 and May 25, 2014.
4. The Debtor seeks the payment suspension to allow her to catch up on her ongoing monthly expenses.
5. Debtor proposes to have the Court enter the order suspending plan payments submitted contemporaneously with this motion. This order contemplates that Debtor will resolve the payment suspension by filing a modified plan within 30 days of the entry of the order suspending payments. The Trustee's Office can file a motion to dismiss if the plan is not filed within that time frame.
6. This motion and the proposed order have been submitted to the Trustee and he has no objection to entry of the order.

WHEREFORE, the Debtor respectfully requests that the Court allow her to suspend payments under her Chapter 13 Plan for two months, covering all pay periods processed by her employer between March 25, 2014 and May 25, 2014.

Respectfully submitted,

VIRGINIA BOOKER BROWN

By counsel

/s/ Jonathan S. Woodruff

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